



# Chiropractic Associates of Minnesota, LLC

## ***RE-CREDENTIALING POLICIES AND PROCEDURES***

CAMN's re-credentialing program is a process used to develop and maintain a network of doctors of chiropractic qualified to deliver appropriate, medically necessary and cost effective care to its members. The credentialing program involves the initial and re-credentialing, verification, and review of information necessary for selection and retention of doctors of chiropractic meeting CAMN's credentialing standards.

The objectives of CAMN's credentialing program include: Assessment of doctors of chiropractic for the organization in an objective and consistent manner. Retention of doctors of chiropractic who are qualified to deliver appropriate, medically necessary and cost effective health care and who are dedicated to the principles of utilization management and quality of care.

**Credentialing Committee:** This committee consists of not more than nine members of CAMN and the Executive Director. The committee reviews and approves re-credentialing policies and procedures; approves applications if there were negative findings during the verification process; and meets as often as necessary to fulfill its responsibilities.

The Executive Director provides guidance to CAMN staff on the overall direction of the re credentialing program; evaluates and reports to CAMN management on the effectiveness of the re-credentialing program. He is responsible for ensuring the Credentialing and Re-credentialing Policies and Procedures are performed by the Director of Provider Relations (DPR) and the Credentialing Committee. This is done by reviewing each re-credentialing application for completeness and to verify the DPR has followed the policies and procedures as required. The Executive Director does not take part in the Re-credentialing approval process.

The Medical Director serves as Chairman of the Credentialing Committee and oversees the credentialing and re-credentialing process. He is responsible for approving applications if there were no negative findings during the verification process. He is responsible for overseeing education for applicants and members.

The DPR verifies and investigates the credentials for all doctors of chiropractic making re-application to CAMN for the purposes of determining the doctors of chiropractic compliance with the Criteria for Participation. Once an application is approved, the DPR forwards any changes in the members' information to the health plans the applicant has chosen to contract with.

## **SCHEDULE FOR RE-CREDENTIALING:**

- 1.0 CAMN will re-credential approximately one-third of all members each year so that all members will be re-credentialed every three years. The re-credentialing will begin no later than May 1<sup>st</sup> of each year. During the years in which members are not re-credentialed, CAMN will obtain proof of their licensure and required malpractice coverage.

## **ITEMS TO BE PROVIDED BY THE PRACTITIONERS DURING THE REVIEW PROCESS:**

- 2.0 Each member will provide CAMN with the following information:
  - 2.1 Copy of the current license(s).
  - 2.2 Completed and signed copy of the Attestation Statement, which the practitioner must sign, regarding the following:
    - 2.2.1 Lack of physical or mental impairment that would substantially impede the applicant's ability to carry out the scope of his or her duties;
    - 2.2.2 Lack of impairment due to chemical dependency or substance abuse;
    - 2.2.3 History of loss of license and or felony convictions; and
    - 2.2.4 History of loss or limitation of privileges or disciplinary activity (as applicable).
  - 2.3 Completed and signed copy of the Application Agreement attesting to the correctness and completeness of the application.
  - 2.4 Updated information sheet verifying any information subject to change including but not limited to the clinic name, clinic address, clinic phone number, federal tax identification number, practitioner's date of birth and social security number.
  - 2.5 Completed provider satisfaction survey.

## **VERIFICATIONS PERFORMED BY CAMN:**

- 3.0 During each re-credentialing process CAMN will primary source verify the following:
  - 3.1 The licensure of each member is current and in good standing and if there are any past or present disciplinary actions.
  - 3.2 The member's malpractice insurance coverage is current and meets the minimum standards.
  - 3.3 Licensure and certification actions, exclusions, health care related criminal convictions, civil judgments, and other actions or decisions. This will be done through the National Practitioner Data Bank (NPDB) web site.

#### **PROOF OF PRIMARY SOURCE VERIFICATION:**

- 4.0 During each re-credentialing process CAMN will request, from the applicable licensing boards, a statement verifying that the licensing board does primary source verification when licensing members in their respective state.

#### **MEMBER RIGHT TO REVIEW:**

- 5.0 On the Application Agreement, which is included in the Physician Credentialing packet, each member is notified that they have the right to review information obtained by CAMN for the purposes of re-credentialing. This includes information obtained from outside sources such as malpractice insurance carriers and state licensing boards. The member is not allowed to review information obtained from references, recommendations or other information that is peer-review protected.

#### **RIGHT TO NOTIFICATION AND CORRECTION OF INFORMATION:**

- 6.0 On the Application Agreement, which is included in the Physician Credentialing packet, each member is notified that they have the right to correct any erroneous information submitted by an outside source or information that varies substantially from that submitted by the member.

#### **NON-DISCRIMINATION:**

- 7.0 Participation in CAMN shall not be denied on the basis of sex, race, age, creed, national origin, or disability unrelated to the capability to fulfill the duties and responsibilities of the member's profession and CAMN's Participating Provider Agreement.

Credentialing committee members sign a confidentiality statement affirming that they do not discriminate when making re-credentialing decisions and that they will abstain in the investigation, deliberations, or votes regarding a partner, associate, relative, employee or a party in direct economic competition. If they believe their participation in the process represents a conflict of interest, they will notify the Executive Director that a conflict of interest may exist and excuse themselves from participation.

CAMN's re-credentialing plan is reviewed, updated and approved by the credentialing committee at least annually.

#### **CONFIDENTIALITY POLICY:**

- 8.0 CAMN shall comply with all state and federal laws and regulations regarding the confidentiality of individual medical records and provider information. Provider information obtained from any source during the re-credentialing process is considered strictly confidential and is used only for the purpose of determining the chiropractor's eligibility to participate and to carry out the duties and obligations of CAMN, except as otherwise provided by law. This information is shared only with those persons or organizations who have authority to receive such information, or who have a need to know in order to perform re-credentialing related functions.

Documents in the custody of CAMN, which may contain confidential patient or provider information, shall be destroyed when such information is no longer necessary for re-credentialing functions, or when no longer required to be maintained by law. Individual provider paper files containing re-credentialing information including history of sanctions and disciplinary actions are stored in locked cabinets. Access to electronic credentialing information is restricted to authorized personnel via sign-on security. All Credentialing Department employees and Credentialing Committee members sign confidentiality statements.

All information and data collected, developed, or considered by the Credentialing Committee is kept confidential and not disclosed except as required to be disclosed under applicable law.

#### **APPROVAL BY CREDENTIALING COMMITTEE:**

9.0 The CAMN Credentialing Committee will review the files of all members scheduled to be re-credentialled and all decisions will be made within 180 days from the date the attestation statement was signed. CAMN will notify all members of their approval within 60 days of the approval.

#### **MONITORING OF SANCTIONS, QUALITY OF CARE ISSUES AND COMPLAINTS**

10.0 For Medicare and Medicaid sanctions CAMN queries the OIG web site <http://oig.hhs.gov> and the EPLS web site <http://www.epls.gov/> on a monthly basis. The Board of Chiropractic Examiners for the states in which our members practice is queried quarterly, however, CAMN may query on a monthly basis. CAMN maintains a log with the date of each query.

10.0.1 Members with any sanctions or any other circumstances, including Quality of Care issues, resulting in failure to meet credentialing criteria are presented to the Credentialing Committee for evaluation and possible action. Profiles of the member's credentials along with the details of the adverse actions and sanctions are presented to the Credentialing Committee.

10.0.1.1 If necessary the Credentialing Committee may request a written explanation from the member of verification documentation regarding the reported actions, sanctions or adverse actions so the member has an opportunity to improve performance before other disciplinary actions or termination occurs. Verification documentation may include, as applicable: a) written explanation from the provider to any affirmative response to adverse actions; b) responses from database queries; c) responses from source/entity imposing the sanction/adverse action; and/or d) court documents.

If the member does not provide the requested information within a timely manner he/she may be subject to quality improvement/performance enhancement action.

- 10.0.2 Disciplinary actions include, but are not limited to:
- Monitoring the provider for a specified time followed by a determination as to whether noncompliance is continuing;
  - Warning the provider that disciplinary action will be taken in the future if noncompliance continues.
  - Requiring the provider to submit and adhere to a corrective action plan;
  - Requiring the provider to obtain training or use peer consultation in specified type(s) of care;
  - Temporarily suspending the provider for noncompliance with participation criteria;
  - Terminating the provider's membership

10.1 Complaints that are received in our office will be logged and forwarded to the Board of Chiropractic Examiners for the state in which the alleged incident occurred. The CAMN Credentialing Committee will also be notified of the action.

10.2 The committee may terminate a member at any time if they determine the doctor no longer meets the Criteria for Participation. When the committee denies membership, the following actions are taken:

#### **DENIAL AND APPEAL:**

11.0 Members whose continued participation is terminated are notified of the termination and the basis for the decision via certified mail within five (5) business days of the decision. A description of the appeal procedures is included in the letter. Members are terminated in accordance with the terms and conditions of the Provider Agreement.

- 11.0.1 Any final action taken by the CAMN Credentialing Committee that is adverse to the member's participation status may be reported to the appropriate state licensing agency and the National Practitioner Data Bank and/or the Healthcare Integrity and Protection Data Bank (HIPDB) as appropriate in accordance with applicable state and federal law.

#### **APPEAL:**

12.0 A member who is terminated is offered an opportunity to request an appeal. The member must make known to the Executive Director of CAMN within thirty (30) business days after notice of the termination of his/her desire to appeal. The notice which must be in writing and sent via certified mail must specify the reasons why the member disagrees with the action and may include any supplemental information.

The Credentialing Committee may appoint a committee or an individual to consider the member's appeal and make a recommendation to the Credentialing Committee, and such committee or individual may in its discretion meet with the member or others with relevant information and require the member to submit additional information. Upon receipt of a recommendation from such committee or individuals, the Credentialing Committee makes its decision, and notifies the member in writing. The decision is final and not subject to further review or appeal.

## **REAPPLICATION AFTER TERMINATION:**

13.0 A former member whose participation has been terminated may not reapply for participation until twenty-four (24) months after the decision denying the re-credentialing has become final. After the twenty-four (24) month period, the former member may submit an application for participation, which shall be processed as an initial application. Such an applicant must furnish evidence that the basis for the termination no longer exists, and/or satisfactory evidence, to the Credentialing Committee that would allow them to grant a waiver and approve the applicant's participation. The applicant must also pay a credentialing fee of \$500.00. The credentialing committee reserves the right to waive the twenty-four (24) month waiting period, and or the \$500 credentialing fee

Updated 6/28/07